

REMARKS/ARGUMENTS

In view of the foregoing amendments and the following remarks, the applicants respectfully submit that the pending claims are not rendered obvious under 35 U.S.C. § 103. Accordingly, it is believed that this application is in condition for allowance. **If, however, the Examiner believes that there are any unresolved issues, or believes that some or all of the claims are not in condition for allowance, the applicants respectfully request that the Examiner contact the undersigned to schedule a telephone Examiner Interview before any further actions on the merits.**

The applicants will now address each of the issues raised in the outstanding Office Action.

Rejections under 35 U.S.C. § 103

Claims 1, 2, 5-10, 28, 40 and 42 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,493,447 ("the Goss patent") in view of U.S. Patent Publication No. US2002/0054064A1 ("the Kannan publication"). The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Independent claims 1 and 28 are not unpatentable in view of the Goss patent and the Kannan publication at least because these references fail to teach or suggest encrypting a synchronized browsing command. The Examiner concedes that the Goss patent fails to disclose encrypting a browsing command by a guide terminal and decrypting the command by a follower terminal. (Paper No. 12, page 4.) In an effort to compensate for this admitted deficiency of the Goss patent, the Examiner relies on the Kannan publication. More specifically, the Examiner contends that the Kannan publication uses secure

socket layer or some other security technique, such as secure hypertext transport protocol to keep a customer service transaction secure. (Paper No. 12, page 4.) The Examiner then concludes that it would have been obvious to one of ordinary skill in the art to modify the method of the Goss patent to encrypt browsing commands, arguing that the Kannan publication suggests that "communication between a customer and a seller must also be secure and private so that the parties can ask questions and exchange personal data such as credit card information to complete the transaction." (Paper No. 12, 5)

The applicants respectfully note that the security measures espoused in the Kannan publication are apparently limited to securing information, such as questions, personal data, and credit card information, needed "to complete a commercial transaction." See paragraph [0010] of the Kannan publication. Securing such information with encryption in no way suggests securing a browsing command using encryption. Accordingly, independent claims 1 and 28 are not rendered obvious by the Goss and Kannan references for at least this reason. Since claims 2, 5-10 and 40 depend, either directly or indirectly, from claim 1, and since claim 42 depends from claim 28, these claims are similarly allowable.

Further, with regard to independent claims 1 and 28, the Examiner concedes that the Goss patent fails to specifically disclose that the follower terminal is configured such that downloading and/or executing applets is disabled, but argues that disabling applets is known. (See Paper 12, page 5.) Although disabling applets is known, the Examiner has provides no motivation why one skilled in the art would have been motivated to disable applets in the Goss/Kannan combination proposed by the Examiner. Indeed, the Goss and Kannan references rely on applets to function. For example, the Goss patent states:

The http communications through the Web site may be enabled and enhanced by Java applets that may be stored on the Web Server that provides the Web site, on the Contact Server, or on a secure data server. **These Java applets may then be simultaneously downloaded to and executed on the agent's and customer's Web browsers. The present invention also provides means to synchronize the execution applets on each desktop to ensure that the agent and customer may communicate with respect to the same data. [Emphasis added.]**

Column 2, line 61 through column 3, line 2. It further states:

In the preferred embodiment of the Contact Server 28 and the call-back services it provides, a customer uses a PC equipped with a Web browser 44 to access a Web site that is supported by the Web Server 30 on the call center's Intranet Server 66. This Web site is secured and requires user authentication. Therefore, a customer must first be setup with a user profile. User profiles may be stored on the Database Server 34, and contain the customer's user i.d., password, and any other data as needed by the particular service. When the customer 42 has been authenticated, the Web Server 30 sends an HTML file that represents the site's home page to the customer's browser 44. **Embedded in this file are the Java applets that manage the call-back services and TCP/IP sessions with agents 14.** The Web Server 30 maintains a session with the customer's browser 44, using

cookies or other session maintenance methodology.

While browsing the Web site, the customer 42 may encounter a need to speak with a call center agent. For example, if the Web site provides access to the trouble ticket database, a customer 42 may view a status of their trouble tickets and subsequently have a question. This is where the call-back service of the present invention is used. An option to place a call-back request is presented; this may be as a floating tool bar or an HTML button presented on each page of the Web site. **When selected, the Java applet running on the customer's browser 44 presents a dialog box, which prompts the customer for call-back information.** This generally includes the customer's name, call-back telephone number, and perhaps other information as needed. When the customer hits enter, the browser sends a message containing this information to the Intranet Server 66, via the Internet 32. [Emphasis added.]

Column 5, lines 63-column 6, line 25. The Goss patent also states:

Establishment and maintenance of the TCP/IP session between the agent and customer is a novel feature. **The Java applets that run on the agent's browser and the customer's browser 44 pass the events performed by the agent and customer to each other.** This is very useful in conjunction with a telephone conversation. As the agent assists the customer 42 via verbal communication, the agent can display examples or point to items on the Web page. As the agent types in text or performs other visible actions on their browser, the agent

hits an update option on their browser. **The update action causes the Java applet that is running to send the updates (agent's actions) to the Web Server 30.** These updates can either be pushed to the customer browser 44, or the customer can pull them from the Web Server 30. Updates are sent in a proprietary application protocol that uses TCP/IP messaging. **The Java applet running on the customer browser reads these updates and performs them on the customer browser 44.** [Emphasis added.]

Column 8, lines 46-63. Similarly, the Kannan publication states:

A method, system, and computer program product provides live customer service between a customer and a CSR in real-time over the World Wide Web. Customer service for the Web is provided which is secure, private and responsive to particular customer needs. Queries sent by potential customers browsing a Web site are intelligently routed to appropriate customer service representatives. Potential customers browsing a Web site are also intelligently routed to appropriate customer service representatives. A memory coupled to a server stores a CS enabled Web site having a service applet. **When a customer browses the CS-enabled Web site, the service applet is downloaded and executes in a customer computer to support the live customer service.** The server executes a customer service agent. The customer service agent enables a customer service window to be displayed by the customer browser. A CSR window is displayed on a browser of the CSR. The customer service agent and service applet determine

whether a customer qualifies for live customer service. The level of customer service to be provided can be based at least upon one of the following: browsing data gathered while the customer browses the CS enabled Web site; a customer profile; and a policy of the CS enabled Web site. The customer service window can include a service dialog window and/or a service form. Polling allows a customer to be notified while the customer is browsing the Web that a CSR has chosen to respond to the query input by the customer. Messages are encapsulated/de-encapsulated in HyperText Transport Protocol (HTTP) to pass through Internet firewalls. Secure communication for Web-based customer service is provided. Communication between the customer and the CSR can be supervised and customer service performance can be tracked. [Emphasis added.]

Abstract.

As can be appreciated from the forgoing, one skilled in the art would not have been motivated to disable applets and/or prevent their download because the Goss and Kannan references both rely on applets to work. Accordingly, independent claims 1 and 28 are not rendered obvious by the Goss and Kannan references for at least this reason. Since claims 2, 5-10 and 40 depend, either directly or indirectly, from claim 1, and since claim 42 depends from claim 28, these claims are similarly allowable.

Claims 3, 4, 29, 30 and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Kannan publication, and further in view of U.S. Patent No. 5,784,564 ("the Camaisa patent").

The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

The Camaisa patent is cited for the purpose of teaching limiting access to web sites. This purported teaching does not compensate for the deficiencies of the Goss patent and the Kannan publication as applied to claims 2 and 28 above. Accordingly, these claims are similarly allowable.

Moreover, one skilled in the art would not have been motivated to combine these patents as proposed by the Examiner. More specifically, restricting a user's access may be a legitimate concern in a system such as the Camaisa patent. However, this does not suggest restricting access in a system where a guide terminal **leads** a synchronized browsing session as in the Goss patent. Accordingly, these claims are not rendered obvious by the Goss patent, the Kannan publication and the Camaisa patent for at least this additional reason.

Further, with regard to dependent claim 39, the Camaisa patent neither teaches, nor suggests, (1) determining whether or not a browsing command includes a resource locator that has a NO GO status based on at least one of first rules regarding resource locators and a first list of resource locators, and (2) if it is determined that the browsing command includes a resource locator that has a NO GO status, then (a) setting a status to NO GO, (b) determining whether or not the browsing command includes a resource locator that has a GO status based on at least one of second rules regarding resource locators and a second list of resource locators, and (c) if it is determined that the browsing command includes a resource locator that has a GO status, then

setting the status to GO. Finally, claim 39 recites that the content associated with the browsing command is requested if the status is GO. The Camaisa patent merely discloses a simple list of permissible Websites. It neither teaches, nor suggests, the two-step process of (1) checking a first list to filter out, and (2) if filtered out, checking a second list to allow back in, as in dependent claim 39. Accordingly, dependent claim 39 is allowable over the Goss, Kannan and Camaisa references for at least this additional reason.

Claims 11-13, 20, 33, 34, 36 and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,181,689 ("the Choung patent"). The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Independent claims 11, 13 and 20 are not unpatentable in view of the Choung patent because the Choung patent neither teaches, nor suggests, (1) sending, from a guide terminal to a follower terminal, a browsing command, and (2) a follower terminal configured such that downloading applets and/or execution of applets is disabled. Each of these elements is addressed below.

The Choung patent neither teaches, nor suggests, sending, from a guide terminal to a follower terminal, "a browsing command". The guide terminal merely sends location information, not a browsing command. A collaborative controller program then sends this location information to a browser synchronizer program on the follower terminal. More specifically, the section of the Choung patent cited by the Examiner states:

In step 608, user 1 uses web browser 204 in terminal 102..1 to navigate a new web page from web site 116, via data network 106, or from

any of the conventional web sites (112..1, 112..2, . . . , or 112..N).

In step 610, web browser 204 informs browser tracker 208 the location information for the new web page. A specific type of web page location information is called URL (Uniform Resource Locator).

In step 612, **browser tracker 208 sends the new web page location information to collaborative controller program 224, via data network 106**. Collaborative controller program 224 stores the new web page location information into collaborative database 228.

In step 614, via data network 106, **collaborative controller program 224 relays the new web page location information to all browser synchronizer(s) in the following terminal(s) according to the session member list stored in collaborative database 228**. In this example, collaborative controller program 224 relays the new web page location information to browser synchronizer 216.

In step 616, **the browser synchronizer(s) in the following terminal(s) updates/update its/their respective web browser(s) with the new web page location information**. In this example, browser 216 updates web browser 214 with the new web page location information.

In step 618, the web browser(s) in the following terminal(s) loads/load the new web page based on the new web page location information. In this example, web browser 214 loads the new web page based on the new web page location information. [Emphasis added.]

To reiterate, the guide terminal sends location information, not a browser command. Accordingly, claims

11 and 13 are not rendered obvious by the Choung patent for at least this reason. Since claims 12, 33, 34, 26 and 37 depend, either directly or indirectly, from claim 11, they are similarly allowable over the Choung patent.

Further, the Choung patent neither teaches, nor suggests a follower terminal configured such that downloading applets and/or execution of applets is disabled. The Examiner notes that disabling applets is known. The Examiner concludes that it would have been obvious "to disable applets for obvious security reasons." Paper No. 12, page 7. However, the Examiner has not established any motivation in the art to disable applets in the context of the system discussed in the Choung patent. Accordingly, claims 11, 13 and 20 are not rendered obvious by the Choung patent for at least this reason. Since claims 12, 33, 34, 26 and 37 depend, either directly or indirectly, from claim 11, they are similarly allowable over the Choung patent.

Moreover with regard to independent claim 20, the Examiner did not even address the recited method for establishing a synchronized browsing session, and therefore did not establish even a *prima facie* showing of obviousness.

Claims 14, 21, 22 and 35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Choung patent, in view of the Kannan publication. The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Since the purported teaching of the Kannan publication does not compensate for the deficiencies of the Choung application with respect to claims 11 and 20, these claims are allowable for at least the same reasons as claims 11 and 20. Moreover, as discussed above, the security measures espoused in the Kannan publication are apparently limited to securing information, such as questions, personal data, and credit card information,

needed "to complete a commercial transaction." Paragraph [0010]. Securing such information with encryption in no way suggests securing a browsing command using encryption. Accordingly, these claims are allowable for at least this additional reason.

Claims 23, 26, 27, 38 and 41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Camaisa patent. The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

As discussed above, one skilled in the art would not have been motivated to combine these patents as proposed by the Examiner. More specifically, restricting a user's access may be a legitimate concern in a system such as the Camaisa patent. However, this does not suggest restricting access in a system where a guide terminal leads a synchronized browsing session as in the Goss patent. Accordingly, these claims are not rendered obvious by the Goss and Camaisa patents for at least this additional reason.

Dependent claims 27 and 38 are further allowable for the same reasons as discussed above with reference to dependent claim 39.

Claims 24 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Camaisa patent, and further in view of the Kannan publication. The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

These claims are allowable over the cited references for at least the same reason that claim 23 is allowable over the Goss and Camaisa patents.

Moreover, to reiterate, the security measures espoused in the Kannan publication are apparently limited

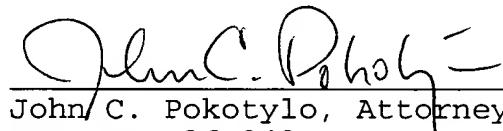
to securing information, such as questions, personal data, and credit card information, needed "to complete a commercial transaction." Paragraph [0010]. Securing such information with encryption in no way suggests securing a browsing command using encryption.

Conclusion

In view of the foregoing, the applicants respectfully submit that the pending claims are in condition for allowance. Accordingly, the applicants request that the Examiner pass this application to issue.

Respectfully submitted,

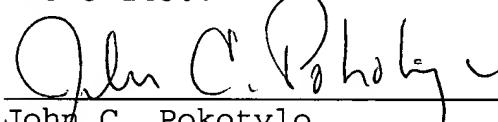
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John C. Pokotylo, Attorney
Reg. No. 36,242

For: Loren Swingle, Attorney
Reg. No. 32,764
(914) 644-2366

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John C. Pokotylo

36,242
Reg. No.